

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI (ST. LOUIS)**

RADHA GEISMANN, M.D., P.C.,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 4:14-cv-00472-CDP
	)	
ZOCDOC, INC.,	)	
	)	
Defendant.	)	

**MOTION TO STRIKE CLASS ALLEGATIONS**

Pursuant to Federal Rules of Civil Procedure 12(f) and 23, defendant ZocDoc, Inc. (“ZocDoc”) moves to deny class certification in this case and strike the class allegations in plaintiff Radha Geismann, M.D., P.C.’s (“Geismann”) Class Action Petition (“Complaint”). Class certification should be denied and the class allegations should be stricken because it is clear from the face of the Complaint that Geismann will not be able to establish commonality, typicality, adequacy, predominance, or superiority.

WHEREFORE, for the foregoing reasons, as set forth more fully in the accompanying memorandum of law, ZocDoc requests that the Court deny class certification and strike the class allegations in the Complaint.

Dated: April 18, 2014

Respectfully submitted,

LATHROP & GAGE LLP

*/s/ Blaine C. Kimrey*

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**Attorneys for defendant ZocDoc, Inc.**

**CERTIFICATE OF SERVICE**

I, Blaine C. Kimrey, hereby certify that on this 18th day of April, 2014, a true and correct copy of the foregoing was served by CM/ECF to the parties registered with the Court's CM/ECF system.

/s/ Blaine C. Kimrey